

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

COTTMAN TRANSMISSION SYSTEMS, LLC	:	CIVIL ACTION
Plaintiff,	:	
v.	:	No. 2:12-cv-05223
MICHAEL GANO	:	
and	:	
412 AUTOMOTIVE, L.P.	:	
Defendants.	:	


COMMONWEALTH OF PENNSYLVANIA	:	
	:	SS.
COUNTY OF MONTGOMERY	:	

AFFIDAVIT OF SUSAN BURG


I, Susan Burg, an adult individual, being duly sworn, do hereby state as follows:

1. I am Senior Director of Advertising for Ross Advertising, the in-house advertising agency for Cottman Transmission Systems, LLC ("Plaintiff" or "Cottman").
2. I am familiar with the history of Defendants Michael Gano ("Defendant" or "Gano") and his privately held entity, 412 Automotive. L.P. ("Defendant" or "Countyline"), as franchisees of Cottman.
3. Defendants have interfered with Cottman's right to control the Cottman telephone line leading to the Center.
4. When Cottman initially had the Cottman advertised telephone line, (724) 850-8812, re-directed away from the Defendants' competing business operating at the former Center, Defendant Gano contacted the telephone company and threatened and convinced it to return the telephone line to the former Center where it now rings.

5. As a result, Cottman customers who call the long established Cottman telephone number (724) 850-8812 are now ringing into Defendants' competing automotive repair business.


Susan Burg

Sworn to and subscribed before me
this 19th day of September, 2012.


Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Alicia O'Connell, Notary Public
Horsham Twp., Montgomery County
My Commission Expires Oct. 4, 2012
Member, Pennsylvania Association of Notaries